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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., HENDRINA VIVAS
CASTILLO, A.C.A., SHERIKA BLANC, VILES
DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**DECLARATION OF N.O. IN SUPPORT OF
PLAINTIFFS' MOTION FOR
COMPLIANCE WITH COURT ORDER**

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DECLARATION OF N.O.

I, N.O., declare:

1. I am a TPS recipient under the 2021 designation for Venezuela. I live in Florence, Kentucky.
2. I work in an Amazon warehouse. I have held the same job for three years. Since August of this year, my employer has been sending me messages asking for a new work permit. I re-registered for TPS in February, and I applied to renew my work permit last week.
3. On Monday, September 8, 2025, I uploaded a copy of the judge's order in the *NTPSA v. Noem* case to Amazon's employee app along with a letter that my immigration attorney provided for me, explaining that TPS was valid under the order and that I could keep working. However, that same day, the human resources team replied that this was not sufficient for verification of my work authorization.
4. The written response from Amazon to my message stated:

“Upon checking the receipt provided is not valid for re-verification or extension.
 Kindly reach out to the employee and suggest them to complete the re-verification with renewed work authorization documents.”

A true and correct copy of this written response is attached as Exhibit A. I have redacted the sender and recipient to protect my confidentiality.
5. I will be fired from my job after tomorrow. As a result, I will also lose my employer-sponsored health insurance.
6. I have not been able to sleep since I learned that I will lose my job. I have a stomachache all the time and I am desperate with worry. I don't know what to do. I have no one to help me or support me. Now, I will have no way to pay my rent, buy food and necessities, or support my family back in Venezuela.
7. I have lived in the United States for seven years; my whole life is here. I have an approved visa petition from my U.S. citizen sister but it is still years away from being available.

1 8. This declaration was read to me in full in Spanish on September 9, 2025, by Emilia
2 Garcia. I completely understand the content of this declaration.

3
4 I declare under penalty of perjury that the foregoing is true and correct. Executed on
5 September 9, 2025 at Florence, Kentucky.

6 N.O.

7 N.O.
8
9

10 CERTIFICATE OF INTERPRETATION

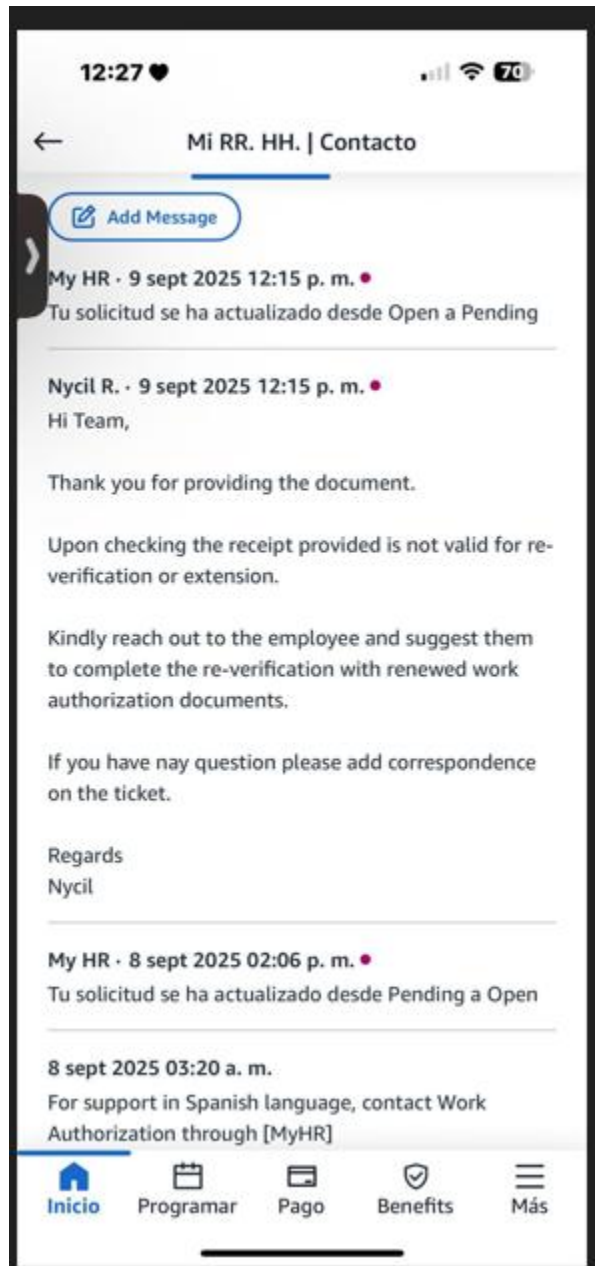
11 I, Emilia Garcia, certify that I am fluent in Spanish and English and that I am competent to
12 interpret between these languages. I further certify that I have read the foregoing to N.O. in
13 Spanish. I further declare that I am competent to render this interpretation and that I would
14 testify to the same under the penalty of perjury if I were called upon to do so.

15
16 Date: September 9, 2025



17 Emilia Garcia
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EXHIBIT A



CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2025, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

ACLU FOUNDATION OF NORTHERN
CALIFORNIA

/s/ Emilou MacLean